



THE CITY OF NEW YORK
LAW DEPARTMENT
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August 21, 2023

BY ECF

The Honorable Jessical G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *SeanPaul Reyes v. City of New York*, 23 CV 6369 (JGLC)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and attorney for defendant City of New York in the above-referenced matter. Defendant writes, with the consent of Plaintiff's counsel Andrew Case, to respectfully request a brief five (5) day enlargement of the deadline for Defendant City to file their Opposition to Plaintiff's motion for a preliminary injunction and the Court's endorsement of the remaining case deadlines as outlined below. This is the City's second request of this kind.

As Your Honor is aware, on August 15, 2023, this Office requested a one week enlargement of the current deadlines in this case, which Your Honor granted on August 15, 2023. Since that time, the undersigned was assigned to handle this matter and has been working diligently to familiarize himself with the issues presented and prepare the City's opposition to Plaintiff's motion for a preliminary injunction. To that end, because there are complex issues in this case, the undersigned requires additional time to prepare the City's opposition to Plaintiff's motion for a preliminary injunction. As noted above, Plaintiff's counsel consents to Defendant's request, however, has requested that the date for the hearing on the preliminary injunction remain as August 31, 2023. Counsel additionally requests a brief extension of his reply deadline from August 28, 2023 to August 29, 2023.

For the reasons set forth above, Defendant City respectfully requests the Court's endorsement of the following deadlines:

- An enlargement from August 21, 2023 to August 25, 2023 for the City to file an opposition to Plaintiff's motion for a preliminary injunction;
- An enlargement from August 24, 2023 to August 29, 2023 to answer or otherwise respond to the complaint;
- An enlargement from August 28, 2023 to August 29, 2023 for plaintiff to file any reply to defendant's opposition to the motion;
- the Order to Show Cause hearing to remain scheduled as August 31, 2023 at 3:00 p.m..

Thank you for your consideration herein.

Respectfully submitted,

Gregory Musso

Gregory Musso
Senior Counsel
Special Federal Litigation Division

cc: **By ECF**
Andrew Case, Esq.
Attorney for plaintiff